

# Thomas-Jensen Affirmation

## Exhibit # 51

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00039-JJM-PAS

**DECLARATION OF LANCE M. TANAKA**

I, Lance M. Tanaka, declare as follows:

1. I am a resident of the State of Hawai‘i. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Department of Land and Natural Resources, State of Hawai‘i (“DLNR”) as an Accountant. I work in the Audit & Compliance Section of the Administrative Services Office of DLNR.

3. The DLNR is responsible for enhancing, protecting, conserving, and managing Hawai‘i’s unique and limited natural, cultural, and historic resources held in public trust for current and future generations of the people of Hawai‘i nei, and its visitors, in partnership with others from the public and private sectors.

4. My duties as an Accountant for DLNR include working with the federal payment system, the Automated Standard Application for Payments (“ASAP”), and working on the Schedule of Expenditures of Federal Awards, which is a schedule the DLNR submits for the State of Hawai‘i Single Audit of Federal Financial Assistance Programs for each fiscal year. My duties include drawing down funds from various federal grants that have been granted to the State of Hawai‘i, DLNR in the ASAP.

5. Draw downs and expenditures from federal grants are based on what is spent by the DLNR program that was awarded the federal grant. I process the transaction of drawing down the funding from the ASAP and into DLNR accounts.

6. One of the federal grants I am assigned to draw down upon when requested by DLNR is the federal grant identified by Federal Award Identification Number ("FAIN") 5D98T67001 ("Grant No. 5D98T67001").

7. The DLNR's source of federal grant funding for Grant No. 5D98T67001 is the U.S. Environmental Protection Agency.

8. I work with other employees of the DLNR who are responsible for allocation, distribution, and accounting for the expenditures of the federal grant funds drawn down from the ASAP. I am aware that Leah Laramée is the grant coordinator for Grant No. 5D98T67001.

9. The last date I successfully drew down grant funding through ASAP for Grant No. 5D98T67001 was January 28, 2025.

10. Since January 28, 2025, I have received one request from DLNR staff to draw down federal grant funds from Grant No. 5D98T67001 but have been unable to do so.

11. Attached hereto as "Exhibit A" is a screenshot I took of the ASAP.gov page for Grant No. 5D98T67001 as of February 4, 2025, at approximately 11:53 a.m. Hawai'i Standard Time, when I logged into the account to review the account status indicator and to see if I could draw down funds. The "Requestor ID" on Exhibit A is the DLNR's requestor ID number and I took this screenshot. Exhibit A is a true and accurate copy of the ASAP.gov page for Grant No. 5D98T67001 on February 4, 2025.

12. As reflected on Exhibit A, the account status indicator for Grant No. 5D98T67001 still indicates that the account is "suspended."

13. I am currently unable to process any request to draw down from Grant No. 5D98T67001.

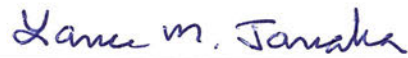
14. The State of Hawai'i, DLNR should be able to access the remaining available balance of One Million, Nine Hundred Ninety-Four Thousand, Seven Hundred dollars and Thirty-Four cents (\$1,994,700.34) for Grant No. 5D98T67001 to administer funds for its grant program, but is unable to due to the account status.

15. With the ASAP account for Grant No. 5D98T67001 being suspended and a lack of communication or guidance from the federal government regarding its suspension, I need to

keep going back and checking the ASAP to see if the account has been opened or released so that I can process DLNR staff's requests.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2025, at Honolulu, Hawai'i.



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LANCE M. TANAKA

## **EXHIBIT A TO TANAKA DECLARATION**



## Account Profile Inquiry

Date: 02/04/2025  
Time: 4:53 PM

ALC/Region:

68128933

Agency Short Name:

RTP-Grants

Account ID:

Recipient ID:

Recipient Short Name:

HI DLNR

## Inquiry Results:

## ACCOUNT DETAILS

Requestor ID : 1544599

Account ID : [REDACTED]

Account Description : IRA CPRP

1031/LOC Account : No

Account Type : Regular Account

Group ID : [REDACTED]

Control Account : No

Account Status

Indicator : Suspended

Available Balance : \$1,994,700.34

Create Date : 07/12/2023

Begin Date : 06/01/2023

Performance Period

End Date : 06/30/2027

End Date : 11/01/2027

TAS Distribution

Method : Percentage by Account

Allow Book Entry

Adjustment : Yes

Allow Warehoused

Payments : Yes

CMIA Indicator : No

## GRANT DETAILS

Grant : Yes

Federal Award

Identification Number

(FAIN) : 5D98T67001

CFDA Number : 66046.000

Total Estimated Grant

Amount : \$0.00

## AGENCY PAYMENT REVIEW

Agency Review : No

Threshold Amount :

Reason for Review :

## DRAW AMOUNTS

Max Total Draw Amount :

Max Daily Draw Amount :

Max Monthly Draw Amount :

Max Quarterly Draw Amount :

## AUTOMATED AUTHORIZATION RENEWALS

Authorized Renewal

Amount : \$0.00

Certified Date :

Renewal Frequency :

Pending Renewal

Frequency :

Pending Automated

Renewal Amount : \$0.00

Rollover Reset Quarter :

Default Action :

## CUMULATIVE AUTHORIZATIONS

Cumulative

Authorized Amount : \$3,000,000.00

Cumulative

Authorized Amount

Reset Period :

Annual Reset Month :